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March 17, 2017

Kristen Hall
U.S. Environmental Protection Agency
Region III (3AP20)
1650 Arch Street
Philadelphia, PA 19103

Dennis M. Abraham
U.S. Environmental Protection Agency
Region III (3RC10)
1650 Arch Street
Philadelphia, PA 19103

Re: DOJ No. 90-5-2-1-09611 – Performance Testing of Selective Catalytic Reduction (SCR) Installation (Area 9, A-Train)

To Whom It May Concern:

AdvanSix Resins & Chemicals LLC ("AdvanSix", formerly Honeywell Resins & Chemicals LLC) is making this submittal pursuant to the Consent Decree in United States of America and Commonwealth of Virginia v. Honeywell Resins & Chemicals LLC, the reference for which is Civil Action Number: 3:13-cv-00193-REP, and DOJ Case Number: 90-5-2-1-09611.

Paragraphs 14 and 19 of the consent decree require AdvanSix to install and operate the SCR technology and four NOx continuous emission monitoring systems (CEMS) on certain of the Area 9 trains by June 30, 2017. Paragraphs 17 and 20 of the consent decree require AdvanSix to conduct performance tests on the SCR and CEMS installations, and Paragraph 17 requires AdvanSix to submit the results of the performance test.

AdvanSix has completed installation and is operating the SCR technology and CEMS on the Area 9 A-Train. In addition, AdvanSix has conducted and passed performance testing of these systems. The installation, startup, and performance testing were all completed in advance of the deadlines set by the consent decree and were executed in compliance with the site's new source review and Title V air permits.

Attachment I contains the results of the NOx performance test and the Relative Accuracy Test Audits (RATA) of the four NOx CEMS installed on the Area 9 A-Train.

If further information is required, please contact me at (804) 541-5119 or by email at Phillip.Sparks@Advan6.com.

Regards,

Phillip Sparks
Sr. Environmental Engineer

Attachments (1)

DOCUMENT CERTIFICATION

Facility Name: AdvanSix Resins & Chemicals LLC


Facility Location: 905 East Randolph Road, Hopewell, VA 23860

Type of Submittal Attached: A-Train SCR Performance Test Results

Consent Decree Certification: I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Name of Authorized Official: Frederick P. Harry

Title: Site Manager

Signature:  **Date:** March 17, 2017
Henry P. Black III for Fred Harry